HSWA CA Permit Countermeasure Worksheet

Use this form to document the analysis, problem solving, and actions taken to return an underperforming metric to meeting target.

	Target	Actual	Gap				
Number of Permit (Renewal/Modification) Application older than 6 months (Permit							
backlog) - Hazardous S	olid Waste Amendments Permits	•					
					·····		
***************************************	Nine Hazardous Solid Waste Act Corrective Acti	on Permits modif	ications or renew	als (in Mississippi) hav	e not been issued by		
Problem Statement							
Root Cause Statement	The backlog was created due to different priori	ties in the prograr	n.				
Actions required to ret		Owner	Due Date	Status			
Communicate to staff that permits are a priority and management no		Bill Denman/					
longer wants to delay renewal until remedy construction is complete.		Keriema					
		Newman	4/17/2018	D-	one		
Conduct detailed analy	sis of each facility's permitting status and issues						
		Permit Writers	4/20/2018	D-	one		
Meet with the Permit \	Writers individually to discuss their analysis.	Permit					
		Writers/RCBB					
		Management	5/10/2018	D.	one		
Project manager/Perm	it writer will develop a site-specific plan for the						
issuing the revised peri	mit at each of their facilities (narrative and						
timeline). The timeline	will include milestones and the target end date						
for the permit issuance	/permit termination.						
•		Permit Writers	5/15/2018	D	one		
By June 1, 2018, develo	pp Visual Management System with target end						
dates for permit issuan	ce/termination for all backlogged permits by the						
end of FY20. The VMS	tracks all 9 HSWA CA permits and provides six						
distinct milestones to t	rack the progress toward permit issuance for all 9						
permits. The projected	timelines depict permit issuance ranging from						
9/2018 through 1/2020).	Keriema					
-		Newman	6/1/2018		one		
		ivewinan	0/1/2010	<u> </u>	Jile		
RCRA Facility		Targeted Date		1			
rental delity		for Permit	Projected Fiscal Year and Quarter for Permit Issuance				
		Issuance	(FY/Q)		or remine issuance		
ERDC-Waterways Expe	riment Station	9/25/2018	FY18/Q4				
PENICK FOREST PRODU		5/1/2019	FY19/Q3				
CHEVRON PRODUCTS (<u>`</u>	5/30/2019	FY19/Q3				
INTERNATIONAL PAPER		9/30/2019	FY19/Q4				
The CHEMOURS Company		10/21/2019	FY20/Q1				
PINE-BELT		11/26/2019	FY20/Q1				
Greenfield Environmen	12/5/2019	FY20/Q1					
CENTREVILLE LANDFAR	1/1/2020	FY20/Q2					
Greenfield Environmen	ital Multistate (Columbus)	It is expected the	at ORC's recommendation will be termination.				

RCAPS RCRA Corrective Action Permit VMS

Goal: To issue permits with in 6 months of recieving the permit application.

	Permit	Permit	Draft Permit Peer	Draft Permit	Draft Permit	Final Permit
	Application Received	Application Determined Complete	Review	Package Routed for Signature	Public Notice	Determination
PINE-BELT WOOD PRESERVING COMP	01/06/1998	Targeted 10/11/2018	Targeted 10/11/2018	Targeted 11/10/2018	Targeted 8/21/2019	Targeted 11/26/2019
Greenfield Environmental Multistate T	03/19/2008	Targeted 6/23/2019	08/06/2015	Targeted 7/1/2019	Targeted 8/15/2019	Targeted 12/5/2019
ERDC-Waterways Experiment Station	06/19/2012	06/19/2012	05/01/2018	Targeted 7/15/2018	Targeted 8/1/2018	Targeted 9/25/2018
PENICK FOREST PRODUCTS, INC.	09/30/2013	Targeted 10/7/2018	Targeted 10/17/2018	Targeted 11/16/2018	Targeted 1/10/2019	Targeted 5/1/2019
The CHEMOURS Company (fka, E.I. DU	01/20/2014	Targeted 4/9/2019	Targeted 5/1/2019	Targeted 6/1/2019	Targeted 6/25/2019	Targeted 10/21/2019
CHEVRON PRODUCTS COMPANY	05/18/2016	Targeted 7/20/2018	Targeted 11/1/2018	Targeted 3/30/2019	Targeted 4/30/2019	Targeted 5/30/2019
GREENFIELD ENVIRONMENTAL MULTI	04/01/2005					
INTERNATIONAL PAPER (Wiggins)	09/04/2002	Targeted 10/31/2018	Targeted 12/28/2018	Targeted 2/28/2019	Targeted 6/28/2019	Targeted 9/30/2019
CENTREVILLE LANDFARM	03/01/2008	Targeted 8/1/2019	Targeted 9/1/2019	Targeted 11/1/2019	Targeted 12/1/2019	Targeted 1/1/2020
GRENADA MANUFACTURING LLC	Targeted 1/29/2020					
HESS CORPORATION	Targeted 9/14/2020					
KOPPERS INC	Targeted 12/16/2021					
AMERICAN WOOD - DIVISION OF POW	Targeted 2/28/2022					
REICHHOLD ENVIRONMENTAL RESPO	Targeted 3/11/2022					
SAFETY-KLEEN SYSTEMS, INC. (Jackson	Targeted 3/25/2022					
FIRST CHEMICAL CORPORATION	Targeted 3/25/2022					
MASTER-BILT PRODUCTS	Targeted 5/18/2023					
CAVENHAM FOREST INDUSTRIES INC	Targeted 5/27/2023					
ASHLAND LLC / JAXON ENERGY, LLC (F	Targeted 3/3/2024					

	Permit Application Received	Permit Application Determined Complete	Draft Permit Peer Review	Draft Permit Package Routed for Signature	Draft Permit Public Notice	Final Permit Determination
TIMCO INC.	Targeted 3/15/2024					
KOPPERS INC (NESCA Target)	Targeted 12/14/2025					
FERNWOOD INDUSTRIES, LLC	Targeted 2/8/2026					
KEESLER AFB, 81ST CES/CEV	Targeted 4/27/2027					
23						

^{*}Measure is tracked on RCRD Bowling Chart. Currently, OLEM is only tracking initial permit application older than 6 months.

Key

Indicates that the Permit Application is more than 6 months old. Permit Backlog

Indicates that the targeted date is within the next 90 days.

Indicates that the targeted date is within the next 30 days.

Indicates the the targeted date has past and the task has not been completed.

Indicates the the targeted date has past prior to the task being completed.

Indicates the task has been completed prior to the targeted date.

Indicates the task has not been targeted becasue the permit is more than 6 months from expiration.

Additional steps in the process can be found in the RCRA/HSWA Permitting Issuance Standard Operating Procedures, which is located at https://usepa.sharepoint.com/sites/R4/RCAPS/Shared%20Documents/How%20to%20Issue%20a%20Permit_SOPs_Models_Templates